

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

LIONRA TECHNOLOGIES LIMITED

v.

FORTINET, INC.

CASE NO. 2:22-cv-00322-JRG-RSP
(Lead Case)

LIONRA TECHNOLOGIES LIMITED

v.

CISCO SYSTEMS, INC.

CASE NO. 2:22-cv-00305-JRG-RSP
(Member Case)

LIONRA TECHNOLOGIES LIMITED

v.

HEWLETT PACKARD ENTERPRISE
COMPANY, et al.

CASE NO. 2:22-cv-00319-JRG-RSP
(Member Case)

LIONRA TECHNOLOGIES LIMITED

v.

PALO ALTO NETWORKS, INC.

CASE NO. 2:22-cv-00334-JRG-RSP
(Member Case)

**DECLARATION OF ASHBey N. MORGAN IN SUPPORT OF DEFENDANTS’
MOTION TO TRANSFER PURSUANT TO 28 U.S.C. § 1404**

I, Ashbey N. Morgan declare under penalty of perjury that the following is true and correct:

1. I am an attorney at Gibson, Dunn & Crutcher, counsel for Defendants’ Hewlett Packard Enterprise Co. and Aruba Networks, LLC (together, “Defendants”). I have personal knowledge of the facts set forth in this declaration and if called as a witness, could testify competently to such facts under oath. I am licensed to practice in the state of Texas.

2. Attached as Exhibit 1 is a true and correct copy of portions of Lionra Technologies Limited’s (“Lionra”) Disclosure of Asserted Claims and Infringement Contentions, served by

[REDACTED]

Lionra on Defendants on November 3, 2022, annotated with highlighting to indicate relevant material.

3. Attached as Exhibit 2 is the Assignment abstract of title for U.S. Appl. No. 11/662,978, which led to U.S. Patent No. 7,916,630, available at <https://assignment.uspto.gov/patent/index.html#/patent/search/resultAbstract?id=7916630&type=patNum> (last accessed December 2, 2022).

4. Attached as Exhibit 3 is the Assignment abstract of title for U.S. Appl. No. 11/600,934, which led to U.S. Patent No. 7,921,323, available at <https://assignment.uspto.gov/patent/index.html#/patent/search/resultAbstract?id=7916630&type=patNum> (last accessed December 2, 2022).

5. [REDACTED]

[REDACTED]

6. [REDACTED]

[REDACTED]

7. [REDACTED]

[REDACTED]

8. [REDACTED]

[REDACTED]

9. Attached as Exhibit 8 is a true and correct screenshot of a Google Maps webpage showing driving directions and travel time for traveling from the Roseville facility at 8000

[REDACTED]

Foothills Boulevard, Roseville, California, to the U.S. Courthouse located at 501 I Street, Sacramento, California.

10. Attached as Exhibit 9 is a true and correct screenshot of a Google Maps webpage showing the distance between San Jose and Sacramento.

11. Attached as Exhibit 10 is a true and correct screenshot of a Google Maps webpage showing the distance between San Francisco and Sacramento.

12. Exhibit 1 to the Declaration of Chris Smith is a true and correct copy of a spreadsheet containing data about Aruba's employees in North America. The size and nature of the spreadsheet makes attaching it as an exhibit in a usable format via this Court's CM/ECF system impractical because the spreadsheet contains several columns and rows of data that are not viewable when in a printable format. As such, Defendants have provided this exhibit in native format on a flash drive to this Court.

13. Exhibit 1 to the Declaration of Scott Koster is a true and correct copy of a spreadsheet containing data about HPE employees in Intelligent Edge. The size and nature of the spreadsheet makes attaching it as an exhibit in a usable format via this Court's CM/ECF system impractical because the spreadsheet contains several columns and rows of data that are not viewable when in a printable format. As such, Defendants have provided this exhibit in native format on a flash drive to this Court.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 2, 2022 in Dallas, Texas.



Ashbey N. Morgan